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MEMO ENDORSED

January 10, 2008

Via Fax: (1-212) 805-6717

Judge Richard M. Berman
United States District Court
Southern District of New York
40 Centre Street, Courtroom 706
New York, NY 10007

Re: Zim Integrated Shipping Services Ltd. v. Belco Resources, Inc. et al.
Docket no. 07 Civ. 5861 (RMB) (GWG)
Our File: 1236-689

SO ORDERED:

Date: 1/10/08

Richard M. Berman
Richard M. Berman, U.S.D.J.

25 pages is more than enough
but PL may use 29 pages
(double space, normal margins,
12' font) as defendants
seem to have done.

Dear Judge Berman:

We are attorneys representing plaintiff ZIM INTEGRATED SHIPPING SERVICES, LTD., in the above captioned matter and we write you in connection to the number of pages of our memorandum of law in support of our opposition to defendants' motion to dismiss the second verified complaint and the motion to vacate the Rule B attachment due tomorrow.

The defendants have filed two motions, a motion to dismiss plaintiff's second verified complaint and a motion to vacate the Rule B attachment. The two motions have been joined together and total 29 pages. The rules of this Court provide that the memorandum of law should not exceed 25 pages. In light of the complexity of the motions which engage in a choice of law analysis in the maritime context and a *forum non conveniens* analysis, and the fact that two motions have been joined in one, we request your permission to file a memorandum of law in support of plaintiff's opposition to defendants' joint motions which shall not exceed 40 pages.

We thank Your Honor for his attention in this matter.

Respectfully Submitted,

DEORCHIS, WIENER & PARTNERS, LLP

By

Vincent M. DeOrchis
Vincent M. DeOrchis

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